

ACUFF & GAMBOA, L.L.P.

ATTORNEYS AT LAW
PARK PLAZA BUILDING
2501 PARKVIEW DRIVE, SUITE 405
FORT WORTH, TEXAS 76102-5816

DEPT. OF TRANSPORTATION
DOCKETS

FMCSA-2007-0089

817/885-8500

FAX 817/885-8504

January 20, 2009

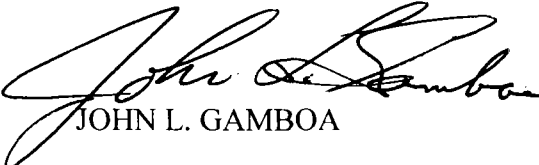
U.S. DOT Dockets
U.S. Department of Transportation
400 7th Street, S.W., Room PL-401
Washington, DC 20590

RE: Docket No. FMCSA-2007-0089; In the Matter of Accent Movers, Inc.

Dear Sir/Madame:

Enclosed please find the original and one copy each of Respondent's Request for Production to Claimant Field Administrator, and Respondent's Interrogatories to Claimant Field Administrator. Please return a file-stamped copy in the enclosed envelope.

Very truly yours,


JOHN L. GAMBOA

JLG/lp
Enclosures

cc: The Honorable Richard C. Goodwin
Administrative Law Judge
Office of Hearings, M-20
United States Department of Transportation
400 Seventh Street, S.W., Room 5411
Washington, DC 20590
Certified Mail RRR

Darrell L. Ruban, Field Administrator
Federal Motor Carrier Safety Administration
Southern Service Center
1800 Century Blvd., Suite 1700
Atlanta, GA 30345
Certified Mail RRR

Joanne A. Cisneros, Texas Division Administrator
U.S. Department of Transportation
Federal Motor Carrier Safety Administration
903 San Jacinto Blvd.
Austin, Texas 78701
Certified Mail RRR

U.S. Department of Transportation
Federal Motor Carrier Safety Administration
FMCSA Docket Clerk
Southern Service Center
1800 Century Blvd, Suite 1700
Atlanta, GA 30345-3104
Certified Mail RRR

Nancy Jackson
Office of Chief Counsel
Federal Motor Carrier Safety Administration
12600 West Colfax Avenue, Suite B-300
Lakewood, Colorado 80215
Certified Mail RRR

UNITED STATES DEPARTMENT OF TRANSPORTATION
OFFICE OF HEARINGS
WASHINGTON, DC

In the Matter of

ACCENT MOVERS, INC.

Respondent.

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Docket No. FMCSA-2007-0089
(Federal Motor Carrier Safety Administration)

RESPONDENT'S REQUEST FOR PRODUCTION
TO CLAIMANT FIELD ADMINISTRATOR

TO: Claimant, Field Administrator, by and through Nancy Jackson, Office of Chief Counsel,
Federal Motor Carrier Safety Administration, 12600 West Colfax Avenue, Suite B-300,
Lakewood, Colorado 80215

Respondent, Accent Movers, Inc., respectfully requests that Claimant Field Administrator
produce the documents requested below to Respondent's attorney of record, John L. Gamboa,
Acuff & Gamboa, LLP, 2501 Parkview Drive, Suite 405, Fort Worth, Texas 76102-5816.

1. Any and all documentary evidence collected during investigation of the alleged
September 11, 2006 violation.

RESPONSE:

2. Any memoranda, reports, etc. (other than attorney-client privilege) that pertain to the
investigation of the alleged September 11, 2006 violation.

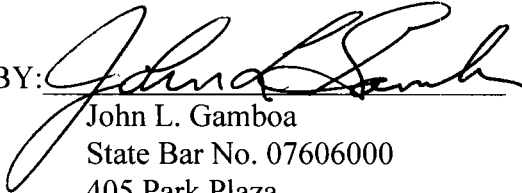
RESPONSE:

3. Copies of any statements, narratives, etc. received or used in the investigation of the
alleged September 11, 2006 violation.

RESPONSE:

Respectfully submitted,

ACUFF & GAMBOA, L.L.P.

BY: 

John L. Gamboa
State Bar No. 07606000
405 Park Plaza
2501 Parkview Drive
Fort Worth, TX 76102
(817) 885-8500
FAX (817) 885-8504
ATTORNEY FOR THE RESPONDENT

CERTIFICATE OF SERVICE

This is to certify that the above and foregoing instrument has been served on the following in accordance with the applicable rules on this the 20 day of January, 2009:

U.S. DOT Dockets
U.S. Department of Transportation
400 7th Street, S.W., Room PL-401
Washington, DC 20590

Original and one copy

The Honorable Richard C. Goodwin
Administrative Law Judge
Office of Hearings, M-20
United States Department of Transportation
400 Seventh Street, S.W., Room 5411
Washington, DC 20590
Certified Mail RRR


Darrell L. Ruban, Field Administrator
Federal Motor Carrier Safety Administration
Southern Service Center
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Joanne A. Cisneros, Texas Division Administrator
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903 San Jacinto Blvd.
Austin, Texas 78701
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U.S. Department of Transportation
Federal Motor Carrier Safety Administration
FMCSA Docket Clerk
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Nancy Jackson
Office of Chief Counsel
Federal Motor Carrier Safety Administration
12600 West Colfax Avenue, Suite B-300
Lakewood, Colorado 80215
Certified Mail RRR

BY:


John L. Gamboa

UNITED STATES DEPARTMENT OF TRANSPORTATION
OFFICE OF HEARINGS
WASHINGTON, DC

In the Matter of

ACCENT MOVERS, INC.

Respondent.

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Docket No. FMCSA-2007-0089
(Federal Motor Carrier Safety Administration)

RESPONDENT'S INTERROGATORIES TO CLAIMANT FIELD ADMINISTRATOR

TO: Claimant, Field Administrator, by and through Nancy Jackson, Office of Chief Counsel,
Federal Motor Carrier Safety Administration, 12600 West Colfax Avenue, Suite B-300,
Lakewood, Colorado 80215

Respondent, Accent Movers, Inc., respectfully requests that Claimant Field Administrator
answer the following interrogatories.

1. Please state the name, address, and telephone number of any potential parties.

ANSWER:

2. Please state the legal theories and, in general, the factual bases of your claims against
Respondent.

ANSWER:

3. Please state the amount and any method of calculating any damages/penalties.

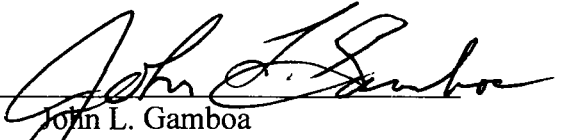
ANSWER:

4. Please state the name, address, and telephone number of persons having knowledge of
relevant facts, and a brief statement of each identified person's connection with the case.

ANSWER:

Respectfully submitted,

ACUFF & GAMBOA, L.L.P.

BY: 
John L. Gamboa

State Bar No. 07606000

405 Park Plaza

2501 Parkview Drive

Fort Worth, TX 76102

(817) 885-8500

FAX (817) 885-8504

ATTORNEY FOR THE RESPONDENT

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The Honorable Richard C. Goodwin

Administrative Law Judge

Office of Hearings, M-20

United States Department of Transportation

400 Seventh Street, S.W., Room 5411

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Darrell L. Ruban, Field Administrator

Federal Motor Carrier Safety Administration

Southern Service Center

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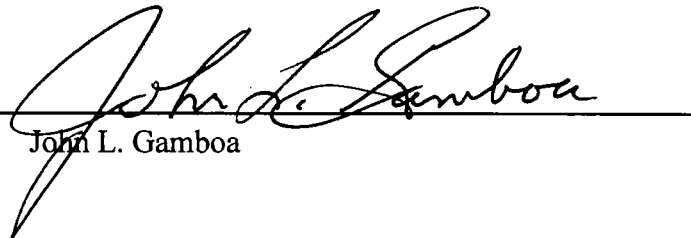
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Joanne A. Cisneros, Texas Division Administrator
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BY:


John L. Gamboa